

AKIN GUMP STRAUSS HAUER & FELD LLP AKIN GUMP STRAUSS HAUER & FELD LLP

Michael S. Stamer (*pro hac vice*)

Ira S. Dizengoff (*pro hac vice*)

David H. Botter (*pro hac vice*)

Abid Qureshi (*pro hac vice*)

One Bryant Park

New York, New York 10036

Telephone: (212) 872-1000

Facsimile: (212) 872-1002

Email: mstamer@akingump.com

idizengoff@akingump.com

dbotter@akingump.com

aqureshi@akingump.com

Ashley Vinson Crawford (SBN 257246)

580 California Street

Suite 1500

San Francisco, CA 94104

Telephone: (415) 765-9500

Facsimile: (415) 765-9501

Email: avcrawford@akingump.com

*Counsel to the Ad Hoc Committee of Senior Unsecured
Noteholders of Pacific Gas and Electric Company*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF WITHDRAWAL OF CHAPTER
11 PLAN OF REORGANIZATION FILED
BY THE AD HOC COMMITTEE OF
SENIOR UNSECURED NOTEHOLDERS**

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

**All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

[Related Docket Nos. 4257, 5519, 5637]

1 **PLEASE TAKE NOTICE** that on October 17, 2019, the Official Committee of Tort Claimants
2 in the above-captioned chapter 11 cases and the Ad Hoc Committee of Senior Unsecured Noteholders of
3 Pacific Gas and Electric Company (the “Ad Hoc Committee”) filed the *Joint Chapter 11 Plan of*
4 *Reorganization of Official Committee of Tort Claimants and Ad Hoc Committee of Senior Unsecured*
5 *Noteholders* [Docket No. 4257] (the “Alternative Plan”).

6 **PLEASE TAKE FURTHER NOTICE** that on January 27, 2020, PG&E Corporation and
7 Pacific Gas and Electric Company (the “Debtors”) filed the *Debtors’ Motion Pursuant to 11 U.S.C.*
8 *Sections 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 For Entry of an Order (I) Approving*
9 *and Authorizing the Debtors to Enter into Restructuring Support Agreement with Consenting*
10 *Noteholders and Shareholder Proponents, and (II) Granting Related Relief* [Docket No. 5519] (the
11 “Motion”),¹ seeking approval of the Restructuring Support Agreement, dated January 22, 2020, among
12 the Debtors, Consenting Noteholders and Shareholder Proponents (the “Noteholder RSA”). Section
13 2(a)(i) of the Noteholder RSA requires, among other things, that the Ad Hoc Committee file a notice of
14 withdrawal of the Alternative Plan upon entry of an order approving the Noteholder RSA.

15 **PLEASE TAKE FURTHER NOTICE** that on February 5, 2020, the Court entered the *Order*
16 *Pursuant to 11 U.S.C. Sections 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 (I) Approving*
17 *and Authorizing the Debtors to Enter into Restructuring Support Agreement with Consenting*
18 *Noteholders and Shareholder Proponents, and (II) Granting Related Relief* [Docket No. 5637].

19 **PLEASE TAKE FURTHER NOTICE** that pursuant to Section 2(a)(i) of the Noteholder RSA,
20 the Ad Hoc Committee hereby withdraws the Alternative Plan.

21 Dated: February 5, 2020

AKIN GUMP STRAUSS HAUER & FELD LLP

22 By: /s/ Ashley Vinson Crawford
23 Ashley Vinson Crawford (SBN 257246)
24 David H. Botter (*pro hac vice*)
25 Michael S. Stamer (*pro hac vice*)
26 Ira S. Dizengoff (*pro hac vice*)
27 Abid Qureshi (*pro hac vice*)

28 *Counsel to the Ad Hoc Committee of Senior Unsecured*
Noteholders of Pacific Gas and Electric Company

¹ Capitalized terms used and not otherwise defined herein shall have the meaning ascribed to such terms in the Motion.